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**RESPOND TO SYRACUSE
OFFICE**

June 12, 2020

Hon. Thomas J. McAvoy
Senior District Judge
United States Courthouse
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

RE: UNITED STATES V. KYLE CATON
CASE NO. 19-CR-245 (TJM)

Dear Judge McAvoy:

On May 11, 2020, Kyle Caton filed a *pro se* motion for compassionate release under 18 U.S.C. § 3582(c)(1)(A) in light of the COVID-19 pandemic. Our office was appointed on May 22, 2020 to explore if Mr. Caton is a viable candidate for filing a motion for compassionate release. Our office has reviewed his case, and we believe he is a viable candidate for compassionate release. On behalf of Mr. Caton, our office requests that this Court consider his *pro se* motion immediately, as it presents a serious and considered claim for relief. In addition to the facts and arguments presented in Mr. Caton's *pro se* motion, we would like to add that Mr. Caton would reside with his mother in New Market, Tennessee, where he would have his own room and the support of his family. What is more, Mr. Caton has no prior criminal history and no history of contact offenses. Therefore, he does not present a risk of future dangerousness.

We also respectfully request that this Court order an expedited response from the government and permit our reply if necessary.

Very truly yours,
OFFICE OF THE FEDERAL PUBLIC DEFENDER

/s/
Lisa A. Peebles
Federal Public Defender